

HEARING DATE AND TIME: May 31, 2012 at 10:00 a.m. (Eastern Time)

RESPONSE DEADLINE: May 16, 2012 at 4:00 p.m. (Eastern Time)

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE TWO HUNDRED EIGHTIETH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT LBHI'S COUNSEL, CINDI GIGLIO, AT 212-696-6936.**

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

101 Park Avenue

New York, New York 10178-0061

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L. P. Harrison 3rd

Cindi Eilbott Giglio

Dienna Ching

*Counsel for Lehman Brothers Holdings Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re : Chapter 11 Case No.  
LEHMAN BROTHERS HOLDINGS INC., *et al.* : 08-13555 (JMP)  
Debtors. : (Jointly Administered)  
-----x

**NOTICE OF HEARING ON THE TWO HUNDRED EIGHTIETH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

**PLEASE TAKE NOTICE** that on April 13, 2012, Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator ("Plan Administrator") pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, filed the two hundred eightieth omnibus objection to claims (the "Two Hundred Eightieth Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the Two Hundred

Eightieth Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **May 31, 2012 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses to the Two Hundred Eightieth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for LBHI, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq. and Mark Bernstein, Esq.); (iii) conflicts counsel for LBHI, Curtis, Mallet-Prevost, Colt & Mosle LLP, 101 Park Avenue, New York, New York 10178-0061 (Attn: L. P. Harrison 3rd, Esq., and Cindi Eilbott Giglio, Esq.); and (iv) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq., and Andrea B. Schwartz, Esq.) so as to be so filed and received by no later than **May 16, 2012 at 4:00 p.m. (Eastern Time)** (the "Response Deadline").

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Two Hundred Eightieth Omnibus Objection to Claims or any claim set forth thereon, the Plan Administrator may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Two Hundred Eightieth Omnibus Objection to Claims as **Exhibit B**, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: April 13, 2012  
New York, New York

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd  
L. P. Harrison 3rd  
Cindi Eilbott Giglio  
Dienna Ching  
101 Park Avenue  
New York, New York 10178-0061  
(212) 696-6000

*Counsel for Lehman  
Brothers Holdings Inc.*

HEARING DATE AND TIME: May 31, 2012 at 10:00 a.m. (Eastern Time)

RESPONSE DEADLINE: May 16, 2012 at 4:00 p.m. (Eastern Time)

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

101 Park Avenue

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L. P. Harrison 3rd

Cindi Eilbott Giglio

Dienna Ching

*Counsel for Lehman Brothers Holdings Inc.***UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re : Chapter 11 Case No.  
: :  
LEHMAN BROTHERS HOLDINGS INC., *et al.* : 08-13555 (JMP)  
: :  
Debtors. : (Jointly Administered)  
-----x

**TWO HUNDRED EIGHTIETH OMNIBUS  
OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED  
PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE TWO  
HUNDRED EIGHTIETH OMNIBUS OBJECTION TO CLAIMS SHOULD  
REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR  
CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION TO DETERMINE  
WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT LBHI'S COUNSEL,  
CINDI GIGLIO, AT 212-696-6936.**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator ("Plan  
Administrator") pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman

Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”) for the debtors in the above referenced chapter 11 cases (the “Debtors”), respectfully represent:

**Relief Requested**

1. The Plan Administrator files this two hundred eightieth omnibus objection to claims (the “Two Hundred Eightieth Omnibus Objection to Claims”), pursuant to section 502(b) of title 11 of the United States Code, as amended (the “Bankruptcy Code”), and Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), seeking to disallow and expunge certain claims for which the Debtors have no liability.

2. The proofs of claim listed on Exhibit A annexed hereto (collectively, the “No Liability Claims”) were filed against the Debtors based upon alleged wrongdoing by or liabilities of an entity which is not a Debtor in these chapter 11 cases and for which the Debtors are not liable. The No Liability Claims are based upon alleged liabilities of Lehman Brothers Inc. (“LBI”). LBI is a separate legal entity and is not a Debtor in these chapter 11 cases. The Debtors have no liability for the asserted obligations of LBI or any No Liability Claim.

**Jurisdiction**

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and Article 14(c) of the Plan. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

**Background**

4. Commencing on September 15, 2008, and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors’ chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b).

5. On September 17, 2008, the United States Trustee for Region 2 (the “U.S. Trustee”) appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the “Creditors’ Committee”).

6. On September 19, 2008, a proceeding was commenced under the Securities Investor Protection Act of 1970 (“SIPA”) with respect to LBI. A trustee appointed under SIPA (the “SIPC Trustee”) is administering LBI’s estate.

7. On December 6, 2011, the Court approved and entered an order confirming the Plan. The effective date of the Plan was March 6, 2012.

8. Pursuant to the Plan, the Plan Administrator is authorized to object to claims filed against the Debtors.

**The No Liability Claims Should Be Disallowed and Expunged**

9. Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

10. In its review of the claims filed on the claims register in these chapter 11 cases, the Plan Administrator has identified the No Liability Claims as claims based upon the

alleged wrongdoing or liabilities of LBI, which is a non-Debtor party and for which the Debtors are not liable. LBI is a separate legal entity and not a Debtor in these chapter 11 cases.

11. The liabilities asserted in the No Liability Claims are not claims against LBHI or any other Debtor in these chapter 11 cases. Unless the No Liability Claims are disallowed and expunged, parties who do not hold valid claims against the Debtors' estate may nonetheless recover from the Debtors. The Plan Administrator respectfully requests the Court enter an order disallowing and expunging the No Liability Claims in their entirety.

**Reservation of Rights**

12. The Plan Administrator reserves all rights to object on any basis to any No Liability Claim as to which the relief requested herein is not granted.

**Notice**

13. No trustee has been appointed in these chapter 11 cases. The Plan Administrator has served notice of the Two Hundred Eightieth Omnibus Objection to Claims on (i) the U.S. Trustee; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the Claimants; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635]. The Plan Administrator submits that no other or further notice need be provided.

14. No previous request for the relief sought herein has been made by the Plan Administrator or the Debtors to this or any other Court.

WHEREFORE the Plan Administrator respectfully requests that the Court grant the relief requested herein and such other and further relief as is just.

Dated: April 13, 2012  
New York, New York

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd  
L. P. Harrison 3rd  
Cindi Eilbott Giglio  
Dienna Ching  
101 Park Avenue  
New York, New York 10178-0061  
(212) 696-6000

*Counsel for Lehman Brothers Holdings Inc*

## **Exhibit A**

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|   | NAME   | CASE NUMBER       | DEBTOR NAME                               | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|---|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 1 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>ATTN: THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL<br>200 VESEY ST<br>NEW YORK, NY 10281  | 08-13600<br>(JMP) | LB 745 LLC                                | 09/17/2009 | 15048   | \$5,000,000.00*     | No Liability Claim               |
| 2 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>ATTN: THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL<br>200 VESEY ST<br>NEW YORK, NY 10281  | 09-12516<br>(JMP) | LB 2080 Kalakaua Owners LLC               | 09/17/2009 | 15049   | \$5,000,000.00*     | No Liability Claim               |
| 3 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS, LLC<br>ATTN: THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL<br>200 VESEY ST<br>NEW YORK, NY 10281 | 09-10560<br>(JMP) | LB Rose Ranch LLC                         | 09/17/2009 | 15050   | \$5,000,000.00*     | No Liability Claim               |
| 4 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS, LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL<br>200 VESEY ST<br>NEW YORK, NY 10281       | 08-13901<br>(JMP) | Lehman Brothers Commercial<br>Corporation | 09/17/2009 | 15051   | \$5,000,000.00*     | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|   | NAME   | CASE NUMBER       | DEBTOR NAME  | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|---|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 5 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS, LLC<br>ATTN: THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL<br>200 VESEY ST<br>NEW YORK, NY 10281 | 08-13905<br>(JMP) | CES Aviation LLC   | 09/17/2009 | 15052   | \$5,000,000.00*     | No Liability Claim               |
| 6 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS, LLC<br>ATTN: THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL<br>200 VESEY ST<br>NEW YORK, NY 10281 | 08-13900<br>(JMP) | Lehman Commercial Paper Inc.                               | 09/17/2009 | 15053   | \$5,000,000.00*     | No Liability Claim               |
| 7 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS, LLC<br>ATTN: THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL<br>200 VESEY ST<br>NEW YORK, NY 10281 | 08-13908<br>(JMP) | East Dover Limited   | 09/17/2009 | 15054   | \$5,000,000.00*     | No Liability Claim               |
| 8 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281         | 09-10108<br>(JMP) | Luxembourg Residential Properties<br>Loan Finance S.a.r.l. | 09/17/2009 | 15296   | \$5,000,000.00*     | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                                | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 9  | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13893<br>(JMP) | Lehman Brothers OTC Derivatives<br>Inc.    | 09/17/2009 | 15297   | \$5,000,000.00*     | No Liability Claim               |
| 10 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13888<br>(JMP) | Lehman Brothers Special Financing<br>Inc.  | 09/17/2009 | 15298   | \$5,000,000.00*     | No Liability Claim               |
| 11 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 09-10558<br>(JMP) | Structured Asset Securities<br>Corporation | 09/17/2009 | 15299   | \$5,000,000.00*     | No Liability Claim               |
| 12 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVC<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13902<br>(JMP) | Lehman Brothers Financial Products<br>Inc. | 09/17/2009 | 15300   | \$5,000,000.00*     | No Liability Claim               |

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## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                                | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 13 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVC<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13555<br>(JMP) | Lehman Brothers Holdings Inc.              | 09/17/2009 | 15301   | \$5,000,000.00*     | No Liability Claim               |
| 14 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13885<br>(JMP) | Lehman Brothers Commodity<br>Services Inc. | 09/17/2009 | 15302   | \$5,000,000.00*     | No Liability Claim               |
| 15 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13664<br>(JMP) | PAMI Statler Arms LLC                      | 09/17/2009 | 15303   | \$5,000,000.00*     | No Liability Claim               |
| 16 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13904<br>(JMP) | Lehman Scottish Finance L.P.               | 09/17/2009 | 15304   | \$5,000,000.00*     | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                                 | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 17 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13899<br>(JMP) | Lehman Brothers Derivative Products<br>Inc. | 09/17/2009 | 15305   | \$5,000,000.00*     | No Liability Claim               |
| 18 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13906<br>(JMP) | CES Aviation V LLC                          | 09/17/2009 | 15306   | \$5,000,000.00*     | No Liability Claim               |
| 19 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 08-13907<br>(JMP) | CES Aviation IX LLC                         | 09/17/2009 | 15307   | \$5,000,000.00*     | No Liability Claim               |
| 20 | BREF ONE, LLC<br>C/O BROOKFIELD REAL ESTATE<br>FINANCIAL PARTNERS LLC<br>THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CNTR,<br>10TH FL<br>200 VESSEY ST<br>NEW YORK, NY 10281 | 09-10137<br>(JMP) | BNC Mortgage LLC                            | 09/17/2009 | 15308   | \$5,000,000.00*     | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                             | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 21 | BROOKFIELD PROPERTIES ONE WFC CO LLC<br>C/O BROOKFIELD FINANCIAL PROPERTIES LP<br>ATTN: GENERAL COUNSEL<br>THREE WORLD FINANCIAL CENTER<br>200 VESEY STREET<br>NEW YORK, NY 10281-1021 | 08-13555<br>(JMP) | Lehman Brothers Holdings Inc.           | 09/22/2009 | 30077   | \$36,114,000.00*    | No Liability Claim               |
| 22 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2005-2 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 09-10560<br>(JMP) | LB Rose Ranch LLC                       | 09/22/2009 | 28859   | Undetermined        | No Liability Claim               |
| 23 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13885<br>(JMP) | Lehman Brothers Commodity Services Inc. | 09/22/2009 | 28860   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME  | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 24 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13906<br>(JMP) | CES Aviation V LLC   | 09/22/2009 | 28861   | Undetermined        | No Liability Claim               |
| 25 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 09-10108<br>(JMP) | Luxembourg Residential Properties<br>Loan Finance S.a.r.l. | 09/22/2009 | 28862   | Undetermined        | No Liability Claim               |
| 26 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13893<br>(JMP) | Lehman Brothers OTC Derivatives<br>Inc.                    | 09/22/2009 | 28863   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                             | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 27 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13900<br>(JMP) | Lehman Commercial Paper Inc.            | 09/22/2009 | 28864   | Undetermined        | No Liability Claim               |
| 28 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13885<br>(JMP) | Lehman Brothers Commodity Services Inc. | 09/22/2009 | 28865   | Undetermined        | No Liability Claim               |
| 29 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13600<br>(JMP) | LB 745 LLC                              | 09/22/2009 | 28866   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                  | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|------------------------------|------------|---------|---------------------|----------------------------------|
| 30 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13908<br>(JMP) | East Dover Limited           | 09/22/2009 | 28867   | Undetermined        | No Liability Claim               |
| 31 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13904<br>(JMP) | Lehman Scottish Finance L.P. | 09/22/2009 | 28868   | Undetermined        | No Liability Claim               |
| 32 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13600<br>(JMP) | LB 745 LLC                   | 09/22/2009 | 28869   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                              | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 33 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13555<br>(JMP) | Lehman Brothers Holdings Inc.            | 09/22/2009 | 28870   | Undetermined        | No Liability Claim               |
| 34 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13902<br>(JMP) | Lehman Brothers Financial Products Inc.  | 09/22/2009 | 28871   | Undetermined        | No Liability Claim               |
| 35 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13899<br>(JMP) | Lehman Brothers Derivative Products Inc. | 09/22/2009 | 28872   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                            | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 36 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13908<br>(JMP) | East Dover Limited                     | 09/22/2009 | 28873   | Undetermined        | No Liability Claim               |
| 37 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13900<br>(JMP) | Lehman Commercial Paper Inc.           | 09/22/2009 | 28874   | Undetermined        | No Liability Claim               |
| 38 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13888<br>(JMP) | Lehman Brothers Special Financing Inc. | 09/22/2009 | 28875   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                             | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 39 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13888<br>(JMP) | Lehman Brothers Special Financing Inc.  | 09/22/2009 | 28876   | Undetermined        | No Liability Claim               |
| 40 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13555<br>(JMP) | Lehman Brothers Holdings Inc.           | 09/22/2009 | 28877   | Undetermined        | No Liability Claim               |
| 41 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13902<br>(JMP) | Lehman Brothers Financial Products Inc. | 09/22/2009 | 28878   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                              | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 42 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13899<br>(JMP) | Lehman Brothers Derivative Products Inc. | 09/22/2009 | 28879   | Undetermined        | No Liability Claim               |
| 43 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13906<br>(JMP) | CES Aviation V LLC                       | 09/22/2009 | 28880   | Undetermined        | No Liability Claim               |
| 44 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13907<br>(JMP) | CES Aviation IX LLC                      | 09/22/2009 | 28881   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME           | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|-----------------------|------------|---------|---------------------|----------------------------------|
| 45 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13905<br>(JMP) | CES Aviation LLC      | 09/22/2009 | 28884   | Undetermined        | No Liability Claim               |
| 46 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13907<br>(JMP) | CES Aviation IX LLC   | 09/22/2009 | 28885   | Undetermined        | No Liability Claim               |
| 47 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13664<br>(JMP) | PAMI Statler Arms LLC | 09/22/2009 | 28886   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                             | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 48 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13904<br>(JMP) | Lehman Scottish Finance L.P.            | 09/22/2009 | 28887   | Undetermined        | No Liability Claim               |
| 49 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13885<br>(JMP) | Lehman Brothers Commodity Services Inc. | 09/22/2009 | 28888   | Undetermined        | No Liability Claim               |
| 50 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2005-2 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13904<br>(JMP) | Lehman Scottish Finance L.P.            | 09/22/2009 | 28889   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                             | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 51 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2005-2 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 09-10558<br>(JMP) | Structured Asset Securities Corporation | 09/22/2009 | 28890   | Undetermined        | No Liability Claim               |
| 52 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2005-2 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13893<br>(JMP) | Lehman Brothers OTC Derivatives Inc.    | 09/22/2009 | 28891   | Undetermined        | No Liability Claim               |
| 53 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2005-2 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13902<br>(JMP) | Lehman Brothers Financial Products Inc. | 09/22/2009 | 28892   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                              | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 54 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2005-2 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281   | 08-13664<br>(JMP) | PAMI Statler Arms LLC                    | 09/22/2009 | 28893   | Undetermined        | No Liability Claim               |
| 55 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD.<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13899<br>(JMP) | Lehman Brothers Derivative Products Inc. | 09/22/2009 | 29514   | Undetermined        | No Liability Claim               |
| 56 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281   | 09-12516<br>(JMP) | LB 2080 Kalakaua Owners LLC              | 09/22/2009 | 29515   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                             | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 57 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 09-10137<br>(JMP) | BNC Mortgage LLC                        | 09/22/2009 | 29516   | Undetermined        | No Liability Claim               |
| 58 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13901<br>(JMP) | Lehman Brothers Commercial Corporation  | 09/22/2009 | 29517   | Undetermined        | No Liability Claim               |
| 59 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 09-10558<br>(JMP) | Structured Asset Securities Corporation | 09/22/2009 | 29518   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME  | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 60 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13555<br>(JMP) | Lehman Brothers Holdings Inc.                              | 09/22/2009 | 29519   | Undetermined        | No Liability Claim               |
| 61 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13888<br>(JMP) | Lehman Brothers Special Financing Inc.                     | 09/22/2009 | 29520   | Undetermined        | No Liability Claim               |
| 62 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 09-10108<br>(JMP) | Luxembourg Residential Properties<br>Loan Finance S.a.r.l. | 09/22/2009 | 29521   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME      | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|------------------|------------|---------|---------------------|----------------------------------|
| 63 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13600<br>(JMP) | LB 745 LLC       | 09/22/2009 | 29522   | Undetermined        | No Liability Claim               |
| 64 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 09-10137<br>(JMP) | BNC Mortgage LLC | 09/22/2009 | 29523   | Undetermined        | No Liability Claim               |
| 65 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281 | 08-13905<br>(JMP) | CES Aviation LLC | 09/22/2009 | 29524   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME  | CASE NUMBER       | DEBTOR NAME                            | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|---|-------------------|--|------------|---------|---------------------|----------------------------------|
| 66 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281                | 08-13901<br>(JMP) | Lehman Brothers Commercial Corporation | 09/22/2009 | 29525   | Undetermined        | No Liability Claim               |
| 67 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN REAL ESTATE CDO 2004-1 LTD<br>ATTN : THERESA A. HOYT, SVP<br>THREE WORLD FINANCIAL CENTER,<br>10TH FL.<br>NEW YORK, NY 10281                | 09-12516<br>(JMP) | LB 2080 Kalakaua Owners LLC            | 09/22/2009 | 29526   | Undetermined        | No Liability Claim               |
| 68 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD.<br>ATTN: THERESA HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESEY STREET<br>NEW YORK, NY 10281 | 09-12516<br>(JMP) | LB 2080 Kalakaua Owners LLC            | 09/22/2009 | 29562   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME         | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|---------------------|------------|---------|---------------------|----------------------------------|
| 69 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 09-10137<br>(JMP) | BNC Mortgage LLC    | 09/22/2009 | 29563   | Undetermined        | No Liability Claim               |
| 70 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 08-13905<br>(JMP) | CES Aviation LLC    | 09/22/2009 | 29564   | Undetermined        | No Liability Claim               |
| 71 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 08-13907<br>(JMP) | CES Aviation IX LLC | 09/22/2009 | 29565   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                            | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 72 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 08-13901<br>(JMP) | Lehman Brothers Commercial Corporation | 09/22/2009 | 29566   | Undetermined        | No Liability Claim               |
| 73 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 09-10560<br>(JMP) | LB Rose Ranch LLC                      | 09/22/2009 | 29567   | Undetermined        | No Liability Claim               |
| 74 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 08-13906<br>(JMP) | CES Aviation V LLC                     | 09/22/2009 | 29568   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME                          | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--------------------------------------|------------|---------|---------------------|----------------------------------|
| 75 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 08-13900<br>(JMP) | Lehman Commercial Paper Inc.         | 09/22/2009 | 29569   | Undetermined        | No Liability Claim               |
| 76 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 08-13664<br>(JMP) | PAMI Statler Arms LLC                | 09/22/2009 | 29570   | Undetermined        | No Liability Claim               |
| 77 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 08-13893<br>(JMP) | Lehman Brothers OTC Derivatives Inc. | 09/22/2009 | 29571   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|    | NAME   | CASE NUMBER       | DEBTOR NAME  | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|----|--|-------------------|--|------------|---------|---------------------|----------------------------------|
| 78 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 09-10108<br>(JMP) | Luxembourg Residential Properties<br>Loan Finance S.a.r.l. | 09/22/2009 | 29572   | Undetermined        | No Liability Claim               |
| 79 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 09-10560<br>(JMP) | LB Rose Ranch LLC  | 09/22/2009 | 29573   | Undetermined        | No Liability Claim               |
| 80 | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 08-13908<br>(JMP) | East Dover Limited   | 09/22/2009 | 29574   | Undetermined        | No Liability Claim               |

## IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 280: EXHIBIT A - NO LIABILITY CLAIMS

|       | NAME   | CASE NUMBER       | DEBTOR NAME                             | FILED DATE | CLAIM # | TOTAL CLAIM DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|-------|--|-------------------|---|------------|---------|---------------------|----------------------------------|
| 81    | BROOKFIELD REAL ESTATE FINANCIAL PARTNERS, LLC<br>BRASCAN STRUCTURED NOTES 2005-2 LTD<br>ATTN: THERESA A. HOYT<br>THREE WORLD FINANCIAL CENTER,<br>10TH FLOOR<br>200 VESSEY STREET<br>NEW YORK, NY 10281 | 09-10558<br>(JMP) | Structured Asset Securities Corporation | 09/22/2009 | 29575   | Undetermined        | No Liability Claim               |
| TOTAL |  |                   |   |            |         |                     | \$136,114,000.00                 |

## **Exhibit B**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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|   |          |                               |
|---|----------|-------------------------------|
| <b>In re</b>  | <b>:</b> | <b>Chapter 11 Case No.</b>    |
|   | <b>:</b> |                               |
| <b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i></b> | <b>:</b> | <b>08-13555 (JMP)</b>         |
|   | <b>:</b> |                               |
| <b>Debtors.</b>                                     | <b>:</b> | <b>(Jointly Administered)</b> |

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**ORDER GRANTING THE TWO HUNDRED EIGHTIETH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the two hundred eightieth omnibus objection to claims, dated April 13, 2012 (the “Two Hundred Eightieth Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator (“Plan Administrator”) pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the debtors in the above referenced chapter 11 cases (the “Debtors”), pursuant to section 502(b) of title 11 of the United States Code, as amended (the “Bankruptcy Code”), and Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, seeking disallowance and expungement of the No Liability Claims on the basis that the Debtors have no liability for such claims, all as more fully described in the Two Hundred Eightieth Omnibus Objection to Claims; and due and proper notice of the Two Hundred Eightieth Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors’ Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the Claimants; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Two Hundred Eightieth Omnibus Objection to Claims.

determined that the relief sought in the Two Hundred Eightieth Omnibus Objection to Claims is in the best interests of the Plan Administrator and all other parties in interest in the above-captioned chapter 11 cases, and that the legal and factual bases set forth in the Two Hundred Eightieth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Two Hundred Eightieth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Two Hundred Eightieth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2012  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE